

WILLIG, WILLIAMS & DAVIDSON

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**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

ERIC M. KELLICH,

Debtors

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Chapter 7

Bankruptcy No. 16-14347-jkf

**AMENDED
CERTIFICATION OF NO RESPONSE
TO DEBTOR'S MOTION TO AVOID JUDGMENT LIEN
OF AMERICAN HERITAGE FEDERAL CREDIT UNION**

The Debtor, by and through undersigned counsel, hereby submits this Certification that there has been no response to the pending Motion To Avoid Judgment Lien Of American Heritage Federal Credit Union. In support of this Certification, counsel states the following:

1. The Amended Motion To Avoid Judgment Lien was filed July 26, 2016.
2. The Motion was accompanied by the form Notice Of Motion, Response Deadline And Hearing Date setting the Deadline for response as August 10, 2016 and the Hearing Date for August 24, 2016.
3. The Motion and Notice were served on the Ch. 13 Trustee, American Heritage Federal Credit Union and the attorney for American Heritage Federal Credit Union in the civil

action.

4. On September 2, 2016, A copy of the Motion to Avoid Judgment Lien, Proposed Order and Order Requiring Answer and Notice of Hearing to Consider Motion, along with a letter advising that the hearing on said Motion was continued to September 21, 2016 was sent by regular mail to Brian Romaniello, Asset Recovery Assistant Manager, American Heritage Federal Credit Union as per instructions from their Compliance Risk Officer.

5. There has been no response from the Trustee or the creditor.

Respectfully submitted,

9/18/16

/s/ Jonathan Krinick
JONATHAN KRINICK, ESQUIRE
Counsel for the Debtor